BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against: DEBORAH MARIE COOKE 380 Winding Way Brea, CA 92821 Registered Nurse License No. 281995 Respondent.	Case No. 2008-124

DECISION

The attached Stipulated Surrender of License and Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on February 22, 2008.

IT IS SO ORDERED February 22, 2008.

La Francine M Tate

President
Board of Registered Nursing
Department of Consumer Affairs
State of California

EDMUND G. BROWN JR., Attorney General
of the State of California
LINDA K. SCHNEIDER
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Attorneys for Complainant

BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against: DEBORAH MARIE COOKE 380 Winding Way Brea, California 92821 Registered Nurse License No. 281995 Respondent.	Case No. 2008-124 **STIPULATED SURRENDER OF LICENSE AND ORDER**

IT IS HEREBY STIPULATED AND AGREED by and between the parties in this proceeding that the following matters are true:

PARTIES

1. Ruth Ann Terry, M.P.H., R.N. (Complainant) is the Executive Officer of the Board of Registered Nursing. She brought this action solely in her official capacity and is represented in this matter by Edmund G. Brown Jr., Attorney General of the State of California, by Antoinette B. Cincotta, Deputy Attorney General.

2. Deborah Marie Cooke (Respondent) is representing herself in this proceeding and has chosen not to exercise her right to be represented by counsel.

3. On or about August 31, 1997, the Board of Registered Nursing issued registered nurse license no. RN 281995 to Deborah Marie Cooke (Respondent). The registered

nurse license was in full force and effect at all times relevant to the charges brought in Accusation No. 2008-124 and will expire on March 31, 2009, unless renewed.

JURISDICTION

4. On or about October 4, 2007, Accusation No. 2008-124 was filed before the Board of Registered Nursing (Board), Department of Consumer Affairs, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on October 31, 2007. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of Accusation No. 2008-124 is attached as Exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

5. Respondent has carefully read, and understands the charges and allegations in Accusation No. 2008-124. Respondent also has carefully read, and understands the effects of this Stipulated Surrender of License and Order.

6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in Accusation No. 2008-124, except as to paragraph numbers 17, 18, and 20 since she administered the marijuana as treatment for the side effects of the interferon (Avonex) she receives for her multiple sclerosis, and agrees that cause exists for discipline and hereby surrenders her registered nurse license No. RN281995 for the Board's formal acceptance.

9. Respondent understands that by signing this stipulation she enables the Board to issue an order accepting the surrender of her registered nurse license without further process.

CONTINGENCY

10. This stipulation shall be subject to approval by the Board of Registered Nursing. Respondent understands and agrees that counsel for Complainant and the staff of the Board of Registered Nursing may communicate directly with the Board regarding this stipulation and surrender, without notice to or participation by Respondent. By signing the stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

11. The parties understand and agree that facsimile copies of this Stipulated Surrender of License and Order, including facsimile signatures thereto, shall have the same force and effect as the originals.

12. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Order:

ORDER

IT IS HEREBY ORDERED that registered nurse license no. RN281995, issued to Respondent Deborah Marie Cooke is surrendered and accepted by the Board of Registered Nursing.

13. The surrender of Respondent's registered nurse license and the acceptance of the surrendered license by the Board shall constitute the imposition of discipline against Respondent. This stipulation constitutes a record of the discipline and shall become a part of Respondent's license history with the Board.

14. Respondent shall lose all rights and privileges as a registered nurse in California as of the effective date of the Board's Decision and Order.

15. Respondent shall cause to be delivered to the Board both her registered nurse wall and pocket license certificate on or before the effective date of the Decision and Order.

16. Respondent fully understands and agrees that if she ever files an application for licensure or a petition for reinstatement in the State of California, the Board shall treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked license in effect at the time the petition is filed, and all of the charges and allegations contained in Accusation No. 2008-124 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the petition.

17. Should Respondent ever apply or reapply for a new license or certification, or petition for reinstatement of a license, by any other health care licensing agency in the State of California, all of the charges and allegations contained in Accusation No. 2008-124 shall be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any other proceeding seeking to deny or restrict licensure.

18. Total costs of the investigation and enforcement are $2,270.00 through November 21, 2007. Respondent is not required to reimburse the Board for these costs.

19. Respondent shall not apply for licensure or petition for reinstatement for two (2) years from the effective date of the Board of Registered Nursing's Decision and Order.

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ACCEPTANCE

I have carefully read the Stipulated Surrender of License and Order. I understand the stipulation and the effect it will have on my registered nurse license. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Registered Nursing.

DATED: 12-11-07.

Deborah Marie Cooke (Respondent)
Respondent

ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

DATED: _____

EDMUND G. BROWN JR., Attorney General
of the State of California

LINDA K. SCHNEIDER
Supervising Deputy Attorney General

_____
ANTOINETTE B. CINCOTTA
Deputy Attorney General

Attorneys for Complainant

DOJ Matter ID: SD2006802039
80182261.wpd

ACCEPTANCE

I have carefully read the Stipulated Surrender of License and Order. I understand the stipulation and the effect it will have on my registered nurse license. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Registered Nursing.

DATED: _____.

_____
Deborah Marie Cooke (Respondent)
Respondent

ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

DATED: 12/20/2007

EDMUND G. BROWN JR., Attorney General
of the State of California

LINDA K. SCHNEIDER
Supervising Deputy Attorney General

_____
ANTOINETTE B. CINCOTTA
Deputy Attorney General

Attorneys for Complainant

DOJ Matter ID: SD2006802039
80182261.wpd

Exhibit A

Accusation No. 2008-124

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of the State of California
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Attorneys for Complainant

BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against: DEBORAH MARIE COOKE 380 Winding Way Brea, California 92821 Registered Nurse License No. 281995 Respondent.	Case No. 2008-124 **ACCUSATION**

Complainant alleges:

PARTIES

1. Ruth Ann Terry, M.P.H., R.N. ("Complainant") brings this Accusation solely in her official capacity as the Executive Officer of the Board of Registered Nursing ("Board"), Department of Consumer Affairs.

2. On or about August 31, 1977, the Board issued Registered Nurse License Number 281995 to Deborah Marie Cooke ("Respondent"). Respondent's registered nurse license was in full force and effect at all times relevant to the charges brought herein and will expire on March 31, 2009, unless renewed.

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STATUTORY PROVISIONS

3. Business and Professions Code ("Bus. & Prof. Code") section 2750 provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.

4. Bus. & Prof. Code section 2764 provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under Bus. & Prof. Code section 2811, subdivision (b), the Board may renew an expired license at any time within eight years after the expiration.

5. Bus. & Prof. Code section 2761 states, in pertinent part:

> The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:
>
> (a) Unprofessional conduct, which includes, but is not limited to, the following:
>
> (1) Incompetence, or gross negligence in carrying out usual certified or licensed nursing functions . . .

6. Bus. & Prof. Code section 2762 states, in pertinent part:

> In addition to other acts constituting unprofessional conduct within the meaning of this chapter [the Nursing Practice Act], it is unprofessional conduct for a person licensed under this chapter to do any of the following:
>
> (a) Obtain or possess in violation of law, or prescribe, or except as directed by a licensed physician and surgeon, dentist, or podiatrist administer to himself or herself, or furnish or administer to another, any controlled substance as defined in Division 10 (commencing with Section 11000) of the Health and Safety Code or any dangerous drug or dangerous device as defined in Section 4022.
>
> . . . .
>
> (e) Falsify, or make grossly incorrect, grossly inconsistent, or unintelligible entries in any hospital, patient, or other record pertaining to the substances described in subdivision (a) of this section.

7. Health and Safety Code ("Health & Saf. Code") section 11170 states that "[n]o person shall prescribe, administer, or furnish a controlled substance for himself."

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8. Health & Saf. Code section 11173 states, in pertinent part:

> (a) No person shall obtain or attempt to obtain controlled substances, or procure or attempt to procure the administration of or prescription for controlled substances, (1) by fraud, deceit, misrepresentation, or subterfuge; or (2) by the concealment of a material fact.
>
> (b) No person shall make a false statement in any prescription, order, report, or record, required by this division . . .

9. California Code of Regulations, title 16, section ("Regulation") 1442 states:

> As used in Section 2761 of the code, 'gross negligence' includes an extreme departure from the standard of care which, under similar circumstances, would have ordinarily been exercised by a competent registered nurse. Such an extreme departure means the repeated failure to provide nursing care as required or failure to provide care or to exercise ordinary precaution in a single situation which the nurse knew, or should have known, could have jeopardized the client's health or life.

COST RECOVERY

10. Code section 125.3 provides, in pertinent part, that the Board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

CONTROLLED SUBSTANCES AT ISSUE

11. "Dilaudid," a brand of hydromorphone, is a Schedule II controlled substance as designated by Health & Saf. Code section 11055, subdivision (b)(1)(K).

12. "Norco," a combination drug containing hydrocodone bitartrate 10 mg and acetaminophen 325 mg, is a Schedule III controlled substance as designated by Health & Saf. Code section 11056, subdivision (e)(4).

13. "Demerol", a brand of meperidine hydrochloride, is a Schedule II controlled substance as designated by Health & Safety Code section 11055, subdivision (c)(17).

14. "Percocet", a brand of oxycodone, is a Schedule II controlled substance as designated by Health & Saf. Code section 11055, subdivision (b)(1)(N).

15. "Morphine/morphine sulfate" is a Schedule II controlled substance as designated by Health & Saf. Code section 11055, subdivision (b)(1)(M).

16. "Marijuana" is a Schedule I controlled substance as designated by Health & Saf. Code section 11054, subdivision (d)(13).

FACTS

17. In and between August 2004 and November 2004, while employed and on duty as a registered nurse in the Surgical Admitting Unit at St. Jude Medical Center, Fullerton, California, Respondent diverted controlled substances as follows:

Patient No. 1

a. On or about November 17, 2004, Respondent withdrew 2 mg of Dilaudid from the Pyxis for Patient No. 1 at 10:15 a.m., charted in the Medication Administration Record (MAR) and Nursing Notes that she administered 0.5 mg of Dilaudid to Patient No. 1 at 10:40 a.m., but failed to chart the wastage of or otherwise account for the disposition of the remaining 1.5 mg of Dilaudid

b. On or about or about November 17, 2004, Respondent withdrew a total of 20 mg of Norco from the Pyxis under Patient No. 1's name, and charted in the MAR that she administered 20 mg of Norco to the patient at 11:05 a.m. In fact, the physician's order was for 5 to 10 mg of Norco. As a result, Patient No. 1 received twice the prescribed amount of Norco.

Patient No. 2

c. On or about November 16, 2004, at 12:18 p.m., Respondent withdrew 2 mg of Dilaudid under Patient No. 2's name, but failed to chart the administration or wastage of the Dilaudid in the MAR or Nursing Notes, or otherwise account for the disposition of the 2 mg of Dilaudid.

d. On or about November 16, 2004, at 12:40 p.m., Respondent withdrew two (2) 10 mg Norco tablets under Patient No. 2's name when, in fact, there was no physician's order authorizing Norco for Patient No. 2. Respondent failed to chart the administration or wastage of the Norco in the MAR or Nursing Notes or otherwise account for the disposition of the 20 mg of Norco.

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Patient No. 3

e. On or about November 17, 2004, at 12:40 p.m., Respondent withdrew 2 mg of Dilaudid from the Pyxis under Patient No. 3's name. Respondent charged in the Nursing Notes that she administered 0.5 mg of Dilaudid by IV push to Patient No. 3 at 12:40 p.m., but failed to chart the wastage of or otherwise account for the disposition of the remaining 1.5 mg of Dilaudid. Further, Respondent charted in the MAR that she administered Dilaudid to the patient, but failed to document the quantity of the Dilaudid that she administered.

f. On or about November 17, 2004, at 12:46 p.m., Respondent withdrew two (2) 10 mg tablets from the Pyxis under Patient No. 3's name. In fact, the physician's order called for the administration of only 5 to 10 mg of Norco to be administered to Patient No. 3. Respondent withdrew twice the dose of medication ordered by the physician. Further, Respondent charted in the MAR and the Nursing Notes that she administered Norco to the patient, but failed to indicate the quantify administered or wasted or otherwise account for the disposition of the Norco 20 mg.

Patient No. 4

g. On or about November 3, 2004, at 10:59 a.m., Respondent withdrew 2 mg of Dilaudid under Patient No. 4's name, charted in the MAR and Nursing Notes that she administered 0.5 mg of Dilaudid, but failed to chart the wastage of or otherwise account for the disposition of the remaining 1.5 mg of Dilaudid.

h. On or about November 3, 2004, at 12:29 p.m., Respondent withdrew 50 mg of Demerol from the Pyxis under Patient No. 4's name, charted in the MAR that she administered 25 mg of Demerol to the patient at 12:35 p.m., but failed to chart the wastage of or otherwise account for the disposition of the remaining 25 mg of Demerol.

i. On or about November 3, 2004, at 2:38 p.m., Respondent withdrew two (2) 5 mg Percocet tablets from the Pyxis under Patient No. 4's name, yet Respondent charted in the MAR that she administered two (2) Percocet tablets to Patient No. 4 at 11:45 a.m.

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Patient No. 5

j. On or about October 26, 2004, at 9:50 a.m., Respondent withdrew 2 mg of Dilaudid from the Pyxis under Patient No. 5's name when, in fact, the physician's order called for the administration of 0.2 to 0.5 mg of Dilaudid by IV every 5 minutes *up to 1.0 mg*. Further, Respondent charted in the MAR and Nursing Notes that she administered 0.5 mg of Dilaudid to the patient by IV push at 10:00 a.m., but failed to chart the wastage of or otherwise account for the disposition of the remaining 1.5 mg of Dilaudid.

k. On or about October 26, 2004, at 10:50 a.m., Respondent withdrew 20 mg of Norco from the Pyxis under Patient No. 5's name without a physician's order authorizing the medication for the patient. Further, Respondent failed to chart the administration or wastage of the Norco in the MAR or nursing notes or otherwise account for the disposition of the 20 mg of Norco.

Patient No. 6

l. On or about October 26, 2004, at 11:33 a.m., Respondent withdrew 2 mg of Dilaudid from the Pyxis under Patient No. 6's name, charted in the MAR and Nursing Notes that she administered 0.5 mg of Dilaudid to the patient by IV push at 11:30 a.m., but failed to chart the administration or wastage of or otherwise account for the disposition of the remaining 1.5 mg of Dilaudid.

m. On or about October 29, 2004, at 2:46 p.m., Respondent withdrew 20 mg of Norco from the Pyxis under Patient No. 6's name when, in fact, the patient had been discharged from the medical center on October 26, 2004. Further, Respondent failed to chart the administration or wastage of the Norco in the MAR or Nursing Notes or otherwise account for the disposition of the 20 mg of Norco.

Patient No. 7

n. On or about September 24, 2004, at 12:33 p.m., Respondent withdrew 2 mg of Dilaudid from the Pyxis under Patient No. 7's name, charted in the MAR that she administered 1.5 mg of Dilaudid to the patient by IV push at 12:30 p.m., but failed to chart the

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administration or wastage of or otherwise account for the disposition of the remaining 0.5 mg of Dilaudid.

o. On or about September 24, 2004, at 1:11 p.m., Respondent withdrew 10 mg of morphine sulfate from the Pyxis under Patient No. 7's name, charted in the MAR that she administered 5 mg of morphine sulfate to the patient at 1:15 p.m., but failed to chart the administration or wastage of or otherwise account for the disposition of the remaining 5 mg of morphine sulfate.

p. On or about September 24, 2004, at 2:05 p.m., Respondent withdrew 10 mg of morphine sulfate from the Pyxis under Patient No. 7's name, charted in the MAR that she administered 5 mg of morphine sulfate to the patient at 2:00 p.m., but failed to chart the administration or wastage of or otherwise account for the disposition of the remaining 5 mg of morphine sulfate.

Patient No. 8

q. On or about August 6, 2004, between 5:01 p.m. and 7:36 p.m., Respondent withdrew a total of 4 mg of Dilaudid under the name of Patient No. 8, but charted in the MAR that she administered 0.2 mg of Dilaudid to the patient by IV push at 5:00 p.m., another 0.2 mg of Dilaudid at 7:30 p.m., and 0.3 mg of Dilaudid at 8:30 p.m., for a total of 0.7 mg of Dilaudid, indicating that Respondent used medication left over from one of the previous withdrawals that had not been wasted Further, Respondent failed to chart in the MAR or Nursing Notes the administration or wastage of or otherwise account for the disposition of the remaining 3.3 mg of Dilaudid.

Patient No. 9

r. On or about November 11, 2004, at 10:25 a.m., Respondent withdrew 2 mg of Dilaudid from the Pyxis under Patient No. 9's name, charted in the Nursing Notes that she administered 0.5 mg Dilaudid to the patient by IV push at 10:30 a.m., but failed to chart the administration or wastage of or otherwise account for the disposition of the remaining 1.5 mg of Dilaudid. Further, Respondent charted in the MAR that she administered Dilaudid to the patient at 10:30 a.m., but failed to indicate the amount of medication she administered.

s. On or about November 11, 2004, at 10:45 a.m., Respondent withdrew one (1) 10 mg Norco tablet from the Pyxis for Patient No. 9, charted in the MAR and Nursing Notes that she administered Norco to the patient, but failed to document the amount of Norco she administered to Patient No. 9.

17. On or about June 7, 2006, during an interview by an investigator of the Division of Investigation, Department of Consumer Affairs, Respondent admitted that she smokes marijuana at the beginning of the week up to 3 times a day because of her loss of appetite and nausea associated with an illness. Respondent also stated that she does not have a prescription for medicinal marijuana.

18. On or about June 7, 2006, Respondent consented to and underwent a drug screen. Respondent tested positive for marijuana.

FIRST CAUSE FOR DISCIPLINE

(Diversion of Controlled Substances)

19. Respondent is subject to disciplinary action pursuant to Bus. & Prof. Code section 2761, subdivision (a), on the grounds of unprofessional conduct, as defined by Bus. & Prof. Code section 2762, subdivision (a), and in violation of Health and Safety Code section 11173, subdivision (a), in that between August 2004 and November 2004, while employed and on duty as a registered nurse in the Surgical Admitting Unit at St. Jude Medical Center, Fullerton, California, Respondent diverted controlled substances as set forth in paragraph 16, subparagraphs (a) through (s) above, which are incorporated herein by this reference.

SECOND CAUSE FOR DISCIPLINE

(Self-Administration of Controlled Substances)

20. Respondent is subject to disciplinary action pursuant to Bus. & Prof. Code section 2761, subdivision (a), on the grounds of unprofessional conduct, as defined by Bus. & Prof. Code section 2762, subdivision (a), and in violation of Health and Safety Code section 11170, in that Respondent self-administered, marijuana, a controlled substance, as set forth in paragraphs 17 and 18 above, which are incorporated herein by this reference.

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THIRD CAUSE FOR DISCIPLINE

(False Entries in Hospital/Patient Records)

21. Respondent is subject to disciplinary action pursuant to Bus. & Prof. Code section 2761, subdivision (a), on the grounds of unprofessional conduct, as defined by Bus. & Prof. Code section 2762, subdivision (e), in that in and between August 2004, and November 2004, while employed and on duty as a registered nurse in the Surgical Admitting Unit at St. Jude Medical Center, Fullerton, California, Respondent falsified, or made grossly incorrect, grossly inconsistent, or unintelligible entries in the medical center's records pertaining to the controlled substances Dilaudid, Norco, Demerol, Percocet and morphine sulfate, set forth in paragraph 16, subparagraphs (a) to (s) above, which are incorporated herein by this reference.

FOURTH CAUSE FOR DISCIPLINE

(Gross Negligence)

22. Respondent is subject to disciplinary action pursuant to Bus. & Prof. Code section 2761, subdivision (a)(1), on the grounds of unprofessional conduct. In and between August 2004, and November 2004, while employed and on duty as a registered nurse in the Surgical Admitting Unit at St. Jude Medical Center, Fullerton, California, Respondent was guilty of gross negligence within the meaning of Regulation 1442 in her management and administration of controlled substances, as set forth in paragraph 16, subdivisions (a) through (s) above, which are incorporated herein by this reference.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

1. Revoking or suspending Registered Nurse License Number 281995, issued to Deborah Marie Cooke;

2. Ordering Deborah Marie Cooke to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;

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3. Taking such other and further action as deemed necessary and proper.

DATED: 10/4/07

RUTH ANN TERRY, M.P.H., R.N.
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California

Complainant

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